

REMARKS

In the Office Action, the Examiner rejected claims 1, 3, 4, 6-10, 12, 14-18, and 23-26 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Pub. No. 2002/0184401 to Kadel et al. ("*Kadel*") and U.S. Pub. No. 2005/0005261 to Severin ("*Severin*"). The Examiner also rejected claims 20-22 under 35 U.S.C. § 103(a) as being unpatentable over *Kadel*, *Severin*, and U.S. Patent No. 6,920,461 to Hejlsberg et al. ("*Hejlsberg*"). Claims 1, 3, 4, 6-10, 12, 14-18, and 20-26 are pending.

Applicants respectfully traverse the rejection of claims 1, 3, 4, 6-10, 12, 14-18, and 23-26 under 35 U.S.C. § 103(a) as being unpatentable over *Kadel* and *Severin*.

Independent claim 1 recites a computer-readable storage device storing a computer program product for deriving a metadata API from a metamodel in order to develop an application, that causes an apparatus to:

receive the metamodel in a first language, the metamodel describing a diagram of classes that define the development objects, the development objects representing building blocks for developing the application.

Combinations of *Kadel* and *Severin* fail to teach or suggest at least these features of claim 1.

In Figure 1, *Kadel* discloses data source components 102, API 112, and data consumer components 122. A source component 102 is a modular piece of software that handles data retrieval, while a consumer component 122 is a modular piece of software that handles processing of the retrieved data (e.g., computation, transformation, or display). *Kadel*, ¶ [0088]. Source component 102 and consumer component 112 communicate with each other via API 112. *Kadel*, ¶ [0091]. InfoModel

350 is logically included in API 112. *Kadel*, ¶ [0109]; and Figure 3A. InfoModel 350 is a wrapper object that wraps source component 102, and exposes interface information of source component 102 to consumer component 112. *Kadel*, ¶ [0108].

Contrary to the Examiner's allegations on page 2 of the Office Action, *Kadel*'s InfoModel (wrapping object) 350 does not constitute or suggest the claimed "metamodel" at least because InfoModel 350 does not "describe[e] a diagram of classes that define the development objects, the development objects representing building blocks for developing the application," as recited in claim 1 (emphasis added). There is no evidence from *Kadel* that source component 102, (which is wrapped by InfoModel 350) relates to "building blocks for developing the application," as recited in claim 1 (emphasis added). Instead, source component 102 retrieves information for processing by consumer component 122, which is an already developed modular piece of code. *Kadel*, ¶ [0088].

Severin fails to remedy the deficiencies of *Kadel* by also failing to teach or suggest at least the above-identified recitations of claim 1. For at least these reasons, combinations of *Kadel* and *Severin* fail to teach or suggest claim 1. Independent claims 10 and 18, while of different scope than claim 1, distinguish over *Kadel* and *Severin* for reasons similar to claim 1. Claims 3, 4, 6-9, 12, 14-17, and 23-26 are patentable at least due to their dependence from one of the independent claims.

Applicants respectfully traverse the rejection of claims 20-22 under 35 U.S.C. § 103(a) as being unpatentable over *Kadel*, *Severin*, and *Hejlsberg*.

Each of claims 20-22 depend from one of the independent claims. As discussed, *Kadel* and *Severin* fail to teach or suggest the independent claims. *Hejlsberg* fails to

remedy these deficiencies by also failing to teach or suggest the above-identified recitations of claim 1, and similar recitations of claims 10 and 18. For at least these reasons, combinations of *Kadel*, *Severin*, and *Hejlsberg* fail to teach or suggest claims 20-22.

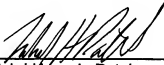
In view of the foregoing, Applicants respectfully request reconsideration of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to Deposit Account 06-0916.

Respectfully submitted,

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